

The Honorable Mary K. Dimke

Paul J. Triesch, WSBA #17445  
Keating, Bucklin & McCormack, Inc., P.S.  
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UNITED STATES DISTRICT COURT  
EASTERN OF WASHINGTON  
AT YAKIMA

YADIRA CONTRERAS, ERICA  
KRONECK, KYLE OLSON, AND  
HENDRY ("CODY") RODMAN III,

Plaintiffs,

v.

HERITAGE UNIVERSITY,

Defendant.

No. 1:22-CV-3034-TOR

DECLARATOIN OF PAUL J.  
TRIESCH

Paul Triesch certifies and declares:

1. I am over the age of eighteen years, competent to testify and I have personal knowledge of the facts stated herein.

2. I serve as defense counsel to Heritage University in this action.

3. Appended as Exhibit 1 is a true and correct copy of a list that shows payments to PA students from July 2020.

4. Appended as Exhibit 2 is a true and correct copy of my May 6, 2025 email to Courtroom Deputy Cora Vargas regarding the payments made in Exhibit 1.

1 I declare under the penalty of perjury under the laws of the State of  
2 Washington that the foregoing is true and correct.

3  
4 Dated this 6<sup>th</sup> of May 2025 at Yakima, Washington.

5  
6 KEATING, BUCKLIN & McCORMACK, INC., P.S.

7 By: /s/ Paul J. Triesch

8 Paul J. Triesch, WSBA #17445

9 *Attorney for Defendant Heritage University*

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## CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

### **Attorneys for Attorneys for Plaintiffs**

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DATED: May 6, 2025

/s/ Lindsey E. Martin  
Lindsey E. Martin, Legal Assistant